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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LAS VEGAS SKYDIVING  
ADVENTURES, LLC,

Plaintiff,

v.

GROUPON, INC.,

Defendant.

Case No.: 2:18-cv-02342-APG-VCF

**STIPULATION AND ORDER TO TAKE  
DEPOSITIONS AFTER DISCOVERY  
CUTOFF AND TO EXTEND  
DISPOSITIVE MOTION DEADLINE  
(FIRST REQUEST)<sup>1</sup>**

Plaintiff Las Vegas Skydiving Adventures, LLC, and Defendant Groupon, Inc. (“Groupon”) by and through their respective counsel of record, and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate and agree as follows:

1. That the following depositions be taken after the discovery cutoff of December 30, 2020, due to Plaintiff’s principals’ family emergencies and to various counsel/witness unavailability:
  - a. 30(b)(6) deposition for Las Vegas Skydiving Adventures (currently noticed for January 14, 2021)

<sup>1</sup> While the parties have previously moved to extend all discovery deadlines, this is the first request solely to allow depositions to occur beyond the discovery cutoff and to move the dispositive motion deadline.

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- b. Sammy Vassilev (currently noticed for January 15, 2021)
- c. Iva Vassilev (currently noticed for January 15, 2021)
- d. Las Vegas Skydiving Adventures' expert witness, W. Anthony Mason (currently noticed for January 13, 2021)
- e. Groupon's expert witness Joshua Moulin (currently noticed for February 8, 2021)
- f. Former Groupon employee Samantha Eller (if Plaintiff deems necessary, and subject to Groupon's right to seek a protective order) (date pending)
- g. Groupon employee Natalie Welebir (if Plaintiff deems necessary, and subject to Groupon's right to seek a protective order) (date pending)

2. That the current deadline for dispositive motions be extended by 60 days from January 29, 2021 to March 30, 2021.

Joint Pretrial Order April 30, 2021.

No additional discovery deadlines will be affected by this stipulation, which is being made in good faith and not in an attempt to delay proceedings.

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

DATED this 16th day of December, 2020

DATED this 16th day of December, 2020

**GIBSON LEXBURY LLP**

**GREENBERG TRAURIG, LLP**

/s/ Roman Nihman

/s/ Tyler R. Andrews

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**IT IS SO ORDERED.**



**UNITED STATES MAGISTRATE JUDGE**

**DATED:** 12-21-2020

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 16th day of December, 2020, a true and correct copy of the foregoing, **STIPULATION AND [PROPOSED] ORDER TO TAKE DEPOSITIONS AFTER DISCOVERY CUTOFF AND TO EXTEND DISPOSITIVE MOTION DEADLINE (FIRST REQUEST)**, was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's EM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Tyler R. Andrews  
An employee of GREENBERG TRAURIG, LLP